



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

## REGIONAL TECHNICAL ASSISTANCE REQUEST FORM

**Date:** October 11, 2000

**Mail and E-Mail to:** Donald A. Cool, Ph.D. (DAC), Director  
Division of Industrial and Medical Nuclear Safety, NMSS  
For E-Mail, cc: IMNS Secretary

**From:** Dwight D. Chamberlain, Director  
Division of Nuclear Materials Safety, RIV

**Licensee:** Accurate NDE & Inspection, LLC  
Louisiana License LA-10207-L01

**Control Number:**   N/A   (if applicable)

**Letter dated:**   September 18, 2000  

**Enforcement Action being held in abeyance:**  Yes  No

**Suggested change in licensing procedure (enclosed):** None

**Problem/Issue:**

By letter dated September 18, 2000, Accurate NDE & Inspection, LLC (Accurate), is requesting an exemption from the requirements specified in 10 CFR 34.20 for the use of various pipeliner devices in NRC jurisdiction.

Accurate has requested an exemption from the requirements specified in 10 CFR 34.20 for the use of SPEC Model SPECK-CHECK II and Gamma Industries Model Pipeliner 1 exposure devices. Accurate proposes to use licensed material in NRC jurisdiction under the authority of a general license pursuant to 10 CFR 150.20, and accordingly has filed with Region IV in accordance with 10 CFR 150.20(b) (copy of NRC Form 241 dated 08/17/00 enclosed). 10 CFR 150.20(b) requires general licensees to comply with the requirements of Subparts C through H of Part 34 in addition to other regulations.

Section 34.20 of 10 CFR Part 34 states, in part, that each radiographic exposure device, source assembly or sealed source, and all associated equipment must meet the requirements specified in American National Standards Institute, N432-1980 "Radiological Safety for the Design and Construction of Apparatus for Gamma Radiography." The aforementioned exposure devices do

not meet these requirements. The exemption request was submitted due to the unique capabilities of the devices and the unavailability of other exposure devices to perform the needed inspection of pipeline construction. Accurate's justifications for requesting an exemption for use of these devices are described in the attached documents.

As a reason for requesting an exemption, Accurate also cited concerns over the safety of using alternate devices not intended for the inspection of pipeline construction.

The State of Louisiana Department of Environmental Quality has granted this licensee an exemption to use these devices throughout the State of Louisiana, in areas not under exclusive Federal jurisdiction (copy of Louisiana Radioactive Material License enclosed).

**Action Requested:**

Determine if the request for an exemption from the requirements specified in 10 CFR 34.20 may be granted for use of the SPEC Model SPECK-CHECK II and Gamma Industries Model Pipeliner 1 exposure devices in accordance with 10 CFR 34.111

**Recommended Action and Alternatives:**  Approve or  Reject

**TARs addressing similar issues (subject and date):**

TARs dated March 16, 1999, and January 26, 2000. Subject: requests for an exemption from 10 CFR 34.20 submitted by Global X-Ray & Testing Corporation; X-Ray Inspection, Inc.; Stolt Comex Seaway, Inc.; and Gulf Coast International Inspection, Inc.

**Background documents (identify those not sent electronically):**

- Memorandum dated August 20, 1998, from William H. Spell, Administrator, Radiation Protection Division Department of Environmental Quality, State of Louisiana
- Environmental Assessment, Finding of No Significant Impact, and Notice of Opportunity for a Hearing, dated August 15, 2000, for Gulf Coast International Inspection, Inc., Louisiana License LA-7396-L01.
- NRC Form 241 dated 08/17/00 and Louisiana Radioactive Material License #LA-10207-L01, Amendment Nos. 3 and 4.

**Remarks:**

This exemption request was prompted by a memorandum (copy enclosed) dated August 20, 1998, from William H. Spell, Administrator, Radiation Protection Division, Department of Environmental Quality, State of Louisiana, to Louisiana Industrial Radiography and Well Logging Licensees. The subject of the August 20, 1998, memorandum is Performing Licensed Activities in Areas of NRC Jurisdiction Including Non-Agreement States, Federal Facilities, and in Off-Shore Waters. The memorandum includes information on the requirements of 10 CFR 34.20 and the need for

Louisiana licensees using equipment that does not meet §34.20 requirements to file an exemption request with the NRC in accordance with 10 CFR 34.111 in order to continue to work within NRC jurisdiction.

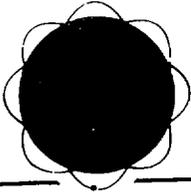
Headquarter Reviewer: \_\_\_\_\_

Regional Reviewer: Christi Hernandez

Reviewer Code: T2

Reviewer Phone Number: (817) 860-8217 FAX Number: (817) 860-8263

Request Needed by: ASAP



# GLOBAL X-RAY & TESTING CORPORATION

Post Office Box 1536  
Morgan City, Louisiana 70381

JOEL MOREAU, President  
Residence: 504-446-6861

Bus: 504-631-2426  
Fax: 504-631-0093

July 11, 2000

JUL 12

U.S.N.R.C.  
611 Ryan Plaza Drive, Suite 400  
Arlington, Texas 76011-8064

SUBJECT: EXEMPTION FROM 10 CFR 34.20(a)(1)

Attn: Mr. Jack Whitten

Dear Mr. Whitten,

This letter is a request to change the wording in certain areas of our Exemption Granted on November 5, 1999. The areas that we are requesting a change are Items number 5 and 8 and an explanation for the requested change. We also added some information about crew size / makeup to help clarify some additional concerns.

Exemption limitations number 1, 2, 3, 4, 6, and 7 are no problem.

**Exemption limitation: 5.** Extension rods with a minimum length of 3 feet shall be used to minimize personnel exposure.

We request a wording change to read **5.** Extension rods with a minimum length of 3 feet shall be used to minimize personnel exposure when applicable to the situation.

**Exemption limitation: 8.** Radiation surveys shall be conducted and recorded before, during and after each exposure.

We request a wording change to read: **8.** Radiation surveys shall be conducted before during and after each exposure.

Attachment 2

HOUMA, LA  
(504) 872-3990

NEW IBERIA, LA  
(318) 367-6514

HARVEY, LA  
(504) 367-8136

BAYOU LaBATRE, AL  
(205) 824-4452

LAFAYETTE, LA  
(318) 261-5840

HOUSTON, TX  
(713) 451-5278

ARANSAS PASS, TX  
(512) 758-5956

### **Explanations:**

**Item number 5.** Under the ideal situation for offshore pipeline radiographic operations the extension or the short crankout works fine. However there are times when the conditions are less than ideal. Such as shooting stalls/bays that are very narrow and crowded with pipe welds coming through the stall at a production rate of 10 to 12 welds per hour. The production rate is established by the contractor's bid (i.e. Firm bid numbers, X number of dollars per foot of pipe laid, meaning that the quicker the contractor finishes the job the more profit he makes).

What tends to happen when you are using a Gamma industries Model 201 and a crankout on a very fast moving pipeline with a 2 man crew is that the radiographer has both hands tied up while utilizing the crankout and trying to keep the crankout from becoming tangled up in the contractors equipment and the radiographer has the tendency to leave the survey meter behind to deal with the hazards associated with using the crankout on a fast moving pipeline. Or the radiographer does not use the crankout at all, which under some circumstances is the safer mode of operation. Safer from the stand point that the radiographer has the survey meter in one hand and operates the pipeliner device with the other hand. Safer because the radiographer does not have to concern himself with making sure the crankout does not get pinched, mashed or destroyed in the contractors equipment (i.e. pipe rollers or the tension machine that applying a squeezing type pressure to the pipe to hold the barge on location).

While using an extension on the Gamma Industries Model 1 device, the radiographer has the extension in one hand and the survey meter in the other hand. However there are circumstances when the extension on the Model 1 becomes a hindrance, just as with the Model 201 and crankout.

**Item number 8.** The scenario of surveying and recording before during and after each exposure is virtually impossible. The time allotted for radiographic operation will not afford an individual time for all the recording as described in the exemption. When we read the exemption we interpreted the wording to mean:

- 1) before – take the reference reading prior to operations and record on the survey sheet,
- 2) during – the survey performed for the restricted area boundary and recorded on the survey sheet ,
- 3) after - surveying the device after each exposure  
(also upon job completion a final survey because this is a 24 hour operation)

We never interpreted the wording to mean:

- 1) survey device before each exposure and record, record the reading
- 2) survey during the exposure and record the reading
- 3) survey the device after each exposure and record the reading

We don't think that the intent of the Exemption is to perform and record as stated. We think the intent is for the radiographer to know where the source is positioned at all times. Also to follow the regulations as far as surveying after each exposure. The surveys that should be recorded are the initial survey, the area survey and the final survey.

JUL 12

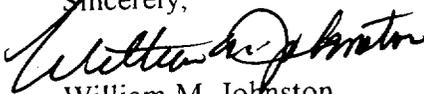
**CREW SIZE / MAKEUP:**

To further add complications to the Radiography companies situation, the Contractors dictate the radiographic crew size. The contractor will say that you (the Radiographic contractor) will use a two-man crew on each shift. (this decision is generally made by the cost of the crew size and the amount of available accommodations for the men). When we tell the contractor that a two man crew is insufficient and that we need a three man crew. Then the contractor says the Regulations used to say that a one-man crew was ok, then the rules changed to read that a two man crew is now necessary. The contractors do not understand that if the crew makeup is a qualified radiographer and a qualified assistant that the assistant cannot perform any work while the radiographer is in the radiographic darkroom developing the radiographs. For proper makeup of a crew, for a highly productive pipelay operation, there needs to be a three-man crew. One qualified radiographer and a qualified assistant on the pipeline performing radiography and another radiographer in the darkroom developing and interpreting the radiographs. Or one qualified radiographer and a qualified assistant on the pipeline performing radiography and a qualified assistant in the darkroom capable of developing and interpreting the radiographs.

We sincerely hope that we have thoroughly covered the areas where we seek wording changes in the Exemption Granted on November 5, 1999.

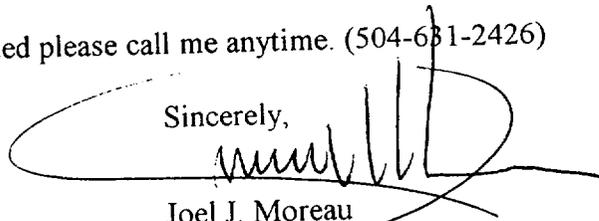
If additional information is needed please call me anytime. (504-631-2426)

Sincerely,



William M. Johnston  
R.S.O.

Sincerely,



Joel J. Moreau  
President, C. E. O.



# Bayou Testers

P.O. Box 1065  
Amelia, LA 70340

Bus: (504) 631-2873  
Fax: (504) 631-3920

August 28, 2000

AUG 31

Attn: Mr. Jack Whitten  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, Tx. 76011

Re: Request for Exemption

Dear Mr. Whitten:

As Bayou Inspection Services, Inc. dba Bayou Testers (hereinafter named Bayou), R.S.O., I would like to submit a request an exemption for the use of our Gamma Industries Pipeliner Model I devices.

I have submitted, for your review, all of the documentation that we have previously submitted to the State of Louisiana, Department of Environmental Quality (DEQ). The DEQ granted our previous request for exemption sometimes around the end of 1996 or the beginning of 1997. It is still in effect today. I have included copies of our Radioactive Material License from 1997 along with our current license. We would like to base this request for the following reasons:

1. The Pipeliner device will be used exclusively for the Radiography on pipeline projects.
2. Due to the fast pace that large pipe laying barges work today, it would be impossible and we feel a lot more dangerous, to perform these jobs with a crankout type exposure device. With a crankout type exposure device,
  - a. you have to many accessories accompanying it, in a usually crowded area: Items such as crankouts, source tubes and colluminator.
  - b. you would have to place and secure the colluminator on a weld that may be over 250 degrees. This poses a severe heat burn hazard.
  - c. you have a time period when the source is in the source tube and completely unshielded.
3. Should Bayou be granted this exemption, we intend to load the pipeliner device with reduced source strength, whenever possible to reduce exposure rate.

Attachment 3

New Iberia, LA  
(318) 364-9055

Houma, LA  
(504) 876-3194

Belle Chasse, LA  
(504) 393-7471

4. Bayou is not aware of any similar type exposure device on the market which complies with current regulations.

I have recently taken over as R.S.O. for Bayou Testers and found that a request for exemption had not been made. With the pipeline laying season in full swing it is my hope that you can consider and grant this request for exemption as soon as possible.

Bayou considers this device to be critical to the success and safety of our pipeline operations and prays that we will be granted this exemption request! Should you have any questions or need additional information please feel free to call me at (504) 631-2873. Thank you and have a good day!

Sincerely,

Paul Fraley  
R.S.O.



PF/  
Enclosures



OCT - 5

Phone: 337-948-7170  
Fax : 337-948-7176

& INSPECTION L. L. C.

U. S. Nuclear Regulatory Commission  
Region IV  
Division of Nuclear Materials Safety  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011

RE: Exemption Request to 10CFR 34.20

September 18, 2000

Dear Ms. Hernandez,

As a representative of the radiation safety department of Accurate N.D.E. & Inspection, L.L.C., I would like to formally request that our company be given an exemption to 10 CFR 34.20. As of July 2, 2000, our company began to pursue an exemption from the State of Louisiana. We were granted that request on September 5, 2000 by the Louisiana Radiation Protection Division and our license was properly amended to include: SPEC Check II Model Pipeliner and Gamma Inds. Model Gamma Pipeliner. We now request your review of our submitted material so that we may function in the Gulf of Mexico, that of which is under your jurisdiction.

Included in the documents submitted to the State of Louisiana we feel we have addressed all of the requirements of which your department desires to be enclosed in our request for exemption as stated in the August 20<sup>th</sup>, 1998 letter to all radiography representatives. As this letter progresses we will elaborate for clarity.

Our company first described the camera models and source model numbers for consideration. We then addressed the new feature we plan to utilize, which is the extension attached to the rotator knob. With respect to the extension we reviewed the possibilities of radiation exposure to personnel. Calculations of different exposures helped us to more firmly establish that the extension will greatly reduce radiation exposure to radiographers by proportionately increasing their distance from the exposure device. Our safety manual addresses the new procedures required for the operation of such devices and our personnel will each be instructed prior to any offshore operations. Their full understanding and actual demonstration on company premises of their abilities will be a requirement by our company for all personnel. The included documentation presented to Louisiana directly reflects our intention of safe operations and procedures to accommodate that activity.

As an RSO and representative of our company I speak for everyone when I say we all feel a personal obligation to the safety of all who are employed and the general public. I would like to repeat our plea to gain exemption with regards to pipeline devices. Our company continually maintains the ALARA( As Low as Reasonably Achievable) concept in all of our operations with respect to radiation dosages. It would be to the industry's disadvantage to try and maintain safe operations with the commonly used equipment of today on pipeline barges due to the fact that they were designed for onshore operations. Space limitations are of great concern to all who function offshore. This limited environment is one that can quickly turn efficient operations into dangerous circumstances.

Attachment 4

ADAMS # M/LCC3758184  
Template NMSS/RGN-002  
Date 10/06/00 QC'd by \_\_\_\_\_



P. O. Box 1298  
Opelousas, LA 70571-1298

Phone: 337-948-7170  
Fax : 337-948-7176

& INSPECTION L. L. C.

The current equipment legally available to us poses significant problems to our radiographers and surrounding personnel in pipeline operations for a number of legitimate reasons. First, the basic function of the current devices utilize a source tube. Source tubes are notorious for quickly posing dangerous problems due to kinks, melting from extremely hot surfaces, and disconnects to name a few. We feel the elimination of tubes by allowing pipeliners in this particular type of situation increases safety tremendously. Second, we would like to address the crank outs of which we are required to use. In pipeline circumstances space limitations are ever increasing creating an environment that can be very detrimental to our operations. Although durable by design the crank out is a radiographer's only method of retrieving a source and to have such a device in cramped quarters poses a difficult and dangerous situation due to other ongoing operations in the immediate area. Third, we would like to address the capabilities of the current models utilized in the industry. Although they serve their purpose well on land they may pose problems in offshore operations. During pipeline operations it is essential that the operator be in close proximity to the camera itself for a couple of reasons. It is typical that operations are being performed close to the surface of the water. Movement on the barges created by the seas is one that cannot be controlled. One must consider that technicians utilizing crank out devices must walk away from that camera very often in a typical workday, thereby creating a window for a mishap due to camera movements while on the deck. The pipeliner is typically attached to the pipe being tested and is close enough for a radiographer to react to any situation in a timely manner. This close proximity allows the radiographer to react to equipment or other situations that may be functioning normally, but pose a threat to the camera. In either case we find that more control can be exercised by the radiographer who is in closer proximity.

Accurate N.D.E. & Inspection. L.L.C. would like to ensure the Nuclear Regulatory Commission that every possible consideration for performing pipelines off shore with our current equipment has been considered and deemed by our representatives to be unsafe practices. We can assure you that every possible safety precaution will be taken by our representatives and radiographers in order to maintain the safest environment for all involved. This is not a goal but a standard practice conducted in our daily operations. With respect to the pipeliners in question, we will go above and beyond what is normally required in the industry in accordance with all regulations. Our company relies on years of field experienced supervisors and technicians, who have all had safe careers in radiography. Please contact us if any other additional information is required. We Thank You for your time and consideration and look forward to a long working relationship with the U.S. Nuclear Regulatory Commission.

Respectfully,

Roy J. Richard Jr.  
RSO. Accurate NDE & Inspection. LLC

2 July 2000

Ms. Diane B. Ausbrooks  
Department of Environmental Quality  
Permits Division  
Radiation Licensing Section  
P.O. Box 82135  
Baton Rouge, LA 70884-2135

RE: License Amendment  
License No. LA-10207-L01

Dear Ms. Ausbrooks:

We would like to amend our above referenced material license as follows:

1. Add one (1) Cs-137 sealed source (Tech/Ops Model 77302) of 111 mCi for instrument calibration in Tech/Ops Model 773 Calibrator. (We have enclosed proposed calibration procedures for your review.)
2. Add Ir-192 sealed sources (SPEC Model G-36), no single source to exceed 150 Ci., for industrial radiography in SPEC Check II Model Pipeliner. (We have enclosed revisions to our Operating & Emergency Procedures that include specific pipeliner procedures for your review.)
3. Add Ir-192 sealed sources (SPEC Model G-23), no single source to exceed 100Ci., for industrial radiography in Gamma Inds. Model Gamma Pipeliner.

We hope the information submitted meets with all your requirements, however, should you require additional information please contact me.

Sincerely,



Roy J. Richard Jr., RSO

Enc.: Procedures



P. O. Box 1298  
Opelousas, LA 70571-1298

Phone: 337-948-7170  
Fax : 337-948-7176

27 August, 00

& INSPECTION L. L. C.

Ms. Diane B. Ausbrooks  
Department of Environmental Quality  
Permits Division  
Radiation Licensing Section  
P.O. Box 82135  
Baton Rouge, LA 70884-2135

RE: License Amendment  
License No. LA- 10207-L01

Dear Ms. Ausbrooks,

In addition to our previously submitted letter for License Amendment dated 2 July, 00 we would like to further clarify our need for the two pipeline cameras: SPEC Check II Model Pipeliner and Gamma Inds. Model Gamma Pipeliner (both as referred to in our previous submittal). We would also like to emphasize our operating procedure for these cameras in particular and our safety precautions.

The prohibition of "PIPELINER" devices by the Nuclear Regulatory Commission since January 10, 1996 has left the industry in a situation, whereby relief can only be limited at this time. In particular, individual companies have requested exemptions to the previous prohibitions for reasons of respectable nature.

The first reason, of which the authorities are already familiar, is the ability to safely service the petroleum industry in the pipeline sector of their construction. The radiography industry has been given no new opportunities of which can be reasonable or reliable in the sense of safely performing inspections on pipeline projects. The typical radiography equipment available is efficient and reasonably safe for land facilities and fabrication, but still poses safety problems in the pipeline area, in particular offshore barges. It is apparent that everyone in the radiography industry must try to pursue the ALARA concept in daily operations for the safety of everyone, but to utilize the current cameras available to us on pipelines would reverse the pursuit for the following reasons. Current camera models utilize source tubes for the positioning of an unshielded source. Pipeline jobsites create a situation of close proximity and high exposure levels to all in the surrounding areas just by merely exposing and retracting the source. In addition this is a crucial time for all concerned with the possibility of "hang-ups", unshielded exposures of lengthy times, and inability to shield surrounding crews. Secondly, many of the welds inspected can typically be as hot as 500°F. At these typically high temperatures source tubes are particularly vulnerable to melting and breakdowns of its own individual components creating a hazard to the radiographer that should be avoided in all circumstances. On the other hand, pipeline cameras avoid the previous mentioned problems with increased shielding and easily directed exposures creating a safer environment for all concerned. It would allow us to further pursue ALARA concepts and attain them with a reasonable consistency.



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Opelousas, LA 70571-1298

Phone: 337-948-7170  
Fax : 337-948-7176

INSPECTION L. L. C.

A second problem of which we as service companies must consider is the ability to serve the petroleum industry. To further reflect upon their need we must consider their current processes in the production of pipelines. Although some new innovations in mechanical welding have been accomplished in the industry, the Gulf of Mexico petroleum and construction industry has not changed to a great extent since the enactment of the prohibition of January 1, 1996. Under this consideration service companies must still safely conduct radiography operations without the proper equipment if the prohibition is strictly followed. To utilize the current equipment, that is designed for different purposes, would leave us to reasonably foresee higher exposures to radiographers, crew members, and public with the chance of accidents of which one rather not entertain the thought. At the present time we realize that a few companies have been allowed to use the "PIPELINERS" for safety and service reasons. We feel that if only a few are allowed to continue it creates an arena of unfair competition and hurts many of the other radiography companies who cannot. In addition it leaves the individual petroleum companies at the will of a few of whom they may not desire to utilize for reasons of their own.

In addition to the camera's design and safety capabilities, our company has decided to further address the situation of our radiographer's individual dosages received. We do plan to install on each "PIPELINER" a flexible tube (approx. 1.5' to 2' long) attached to the Rotator Knob for purposes of increasing the distance of the radiographer closest to the camera during exposures allowing him the same control to expose and retract. By increasing this distance from camera to radiographer we feel we can decrease his total dosage by approximately 75%. Attached is a drawing of the camera with attached flexible tube, and the revised operating and emergency procedures for your consideration.

For the above stated reasons we would like to formally request that our company be allowed to amend our license to include such "PIPELINE" devices for the sake of safety and service. Thank You for your time and consideration.

Respectfully,

Roy J. Richard Jr., RSO

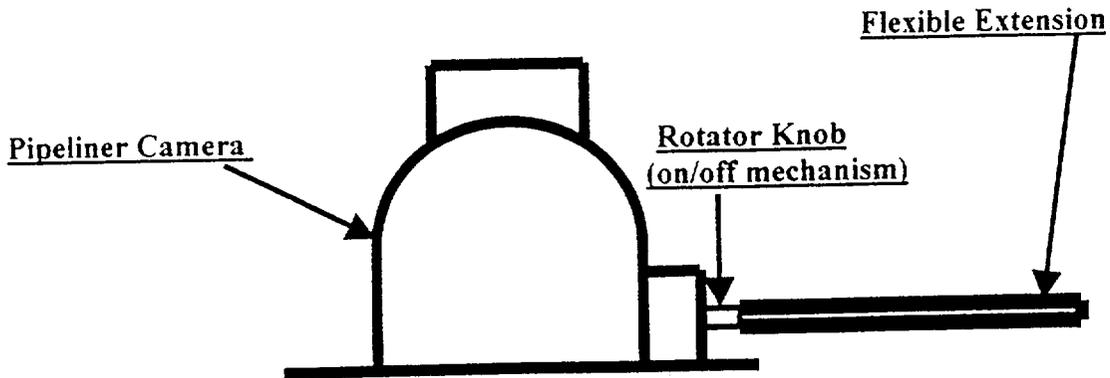


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& INSPECTION L. L. C.

ATTACHMENT 1-A  
( For Illustrative purposes of the proposed attachment to the Rotator Knob)



NUCLEAR REGULATORY COMMISSION  
LOUISIANA LICENSE NUMBERS  
LA-0577-L01; LA-7112-L01; LA-10207-L01;  
REQUEST FOR EXEMPTION FROM 10 CFR 34.20,  
PERFORMANCE REQUIREMENTS FOR  
INDUSTRIAL RADIOGRAPHY EQUIPMENT

**Environmental Assessment, Finding of No Significant Impact, and  
Notice of Opportunity for a Hearing.**

The U. S. Nuclear Regulatory Commission is considering authorizing Global X-ray & Testing Corporation, Bayou Testing Services Inc, Accurate NDE & Inspection L.L.C., and others an exemption to use pipeliner style radiography devices on lay barges in the Gulf of Mexico.

**ENVIRONMENTAL ASSESSMENT**

Identification of the Proposed Action

Global X-ray & Testing Corporation, Morgan City, Louisiana; Bayou Testing Services, Inc, Amelia, Louisiana; Accurate NDE & Inspection L.L.C., Opelousas, Louisiana, (the applicants) are licensed by the State of Louisiana to conduct industrial radiography operations. They have requested, in letters dated July 11, 2000, August 28, 2000, and September 18, 2000, respectively, that the United States Nuclear Regulatory Commission (NRC) grant them reciprocity, and an exemption from 10 CFR 34.20 (a)(1), to use their pipeliner type radiography cameras (pipeliners) for pipeline radiography, on lay barges, in areas under exclusive Federal jurisdiction, within the Gulf of Mexico. Pipeliners are older model radiography cameras that do not meet the requirements of 10 CFR 34.20(a)(1). These regulations require equipment, used

in industrial radiographic operations, to meet the requirements in ANSI N432-1980<sup>1</sup>. Each of the applicants are allowed to conduct similar operations in the State of Louisiana under an exemption granted in their state licenses, and they are requesting NRC exemptions under 10 CFR 150.20 "Recognition of Agreement States Licenses" (Reciprocity).

#### Need for the Proposed Action

The exemption is needed so that the applicants can conduct pipeline radiography on lay barges. The applicants contend that due to the design of the lay barges, and the limited space available, the pipeliner is the only device of its kind that will keep up with production rate on a lay barge, while at the same time provide a safe working environment for their radiographers and barge personnel.

#### Environmental Impacts of the Proposed Action

There will be no significant environmental impact from the proposed action due to the fact that no radioactive material is being released into the environment, and all of the radioactive material is wholly contained within the radiography camera, which is only used in an enclosed radiography stall on a lay barge.

During normal operation the external radiation dose levels will not be significantly greater than an approved radiography camera's normal operating external radiation dose levels. Compensatory safety measures will be in place at all times during the operation of the pipeliner device.

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<sup>1</sup> "Radiological Safety for the Design and Construction of Apparatus for Gamma Radiography (ANSI N432-1980)," (published as NBS Handbook 136, issued January 1981)

### Alternatives to the Proposed Action

As required by Section 102(2)(E) of NEPA (42 USC 4322(2)(E)), possible alternatives to the final action have been considered. The only alternative is to deny the exemption. This option was not considered practical, and there would be no gain in protecting the human environment. Denying the exemption request would force the applicants to revert to radiography cameras that are designed to meet ANSI N432-1980, but, according to the applicants, these cameras would not be easily adaptable to lay barge operations. The newer cameras would be similar to the pipeliners in that their radioactive material is housed as a sealed source and there would be no release of material to the environment. However, the newer cameras have associated equipment, such as a drive cable and guide tube, that would require additional space to perform radiography on pipelines. According to the applicant, this equipment becomes cumbersome and may get in the way as the pipe is moved through the lay barge. In the newer devices, the sealed source would have to be cranked out of the shielded position in the camera housing through a guide tube to the exposure head location where the radiograph takes place. Because this "crank out" action causes the source to be unshielded while the source is cranked out to the exposure head, the "restricted area" boundary must be increased and could cause a greater potential exposure to non-radiography personnel on the lay barge.

### Alternative Use of Resources

No alternative use of resources was considered due to the reasons stated above.

### Agencies and Persons Consulted

The State of Louisiana was contacted by telephone on 04/18/01 regarding this proposed action. The State of Louisiana did not object to the proposed action and had no additional comments.

### Identification of Sources Used

letters from the applicants to U.S. Nuclear Regulatory Commission, Region IV, Re: Global X-ray & Testing Corporation, Louisiana License No. LA-0577-L01, July 11, 2000; Bayou Testing Services Inc., Louisiana License No. LA-7112-L01, August 28, 2000; Accurate NDE & Inspection L.L.C., Louisiana License No. LA-10207-L01, September 18, 2000.

### **FINDING OF NO SIGNIFICANT IMPACT**

Based on the above environmental assessment, the Commission has concluded that environmental impacts that would be created by the proposed action would not have a significant effect on the quality of the human environment and does not warrant the preparation of an Environmental Impact Statement. Accordingly, it has been determined that a Finding of No Significant Impact is appropriate.

The applicants applications are available for inspection and copying for a fee in the Region IV Public Document Room, 611 Ryan Plaza Drive, Suite 400, Arlington, TX 76011-8064. The documents may also be viewed in the Agency-wide Documents Access and Management System (ADAMS) located on the NRC website at [www.nrc.gov](http://www.nrc.gov).

### **OPPORTUNITY FOR A HEARING**

Any person whose interest may be affected by the issuance of this action may file a request for a hearing. Any request for hearing must be filed with the Office of the Secretary, U.S. Nuclear Regulatory Commission, Washington, DC 20555, within 30 days of the publication of this notice in the Federal Register; be served on the NRC staff (Executive Director for Operations, One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852), and on the applicants, Global X-ray & Testing Corporation, P.O. Box 1536, Morgan City, Louisiana 70381; Bayou Testing Services Inc, P.O. Box 1065, Amelia, Louisiana 70340; Accurate NDE &

Inspection L.L.C., P.O. Box 1298, Opelousas, Louisiana 70571-1298 and must comply with the requirements for requesting a hearing set forth in the Commission's regulations, 10 CFR Part 2, Subpart L, "Information Hearing Procedures for Adjudications in Materials Licensing Proceedings."

These requirements, which the request must address in detail, are:

1. The interest of the requestor in the proceeding;
2. How that interest may be affected by the results of the proceeding (including the reasons why the requestor should be permitted a hearing);
3. The requestor's areas of concern about the licensing activity that is the subject matter of the proceeding; and
4. The circumstances establishing that the request for hearing is timely -- that is, filed within 30 days of the date of this notice.

In addressing how the requestor's interest may be affected by the proceeding, the request should describe the nature of the requestor's right under the Atomic Energy Act of 1954, as amended, to be made a party to the proceeding; the nature and extent of the requestor's property, financial, or other (i.e., health, safety) interest in the proceeding; and the possible effect of any order that may be entered in the proceeding upon the requestor's interest.

Dated at Rockville, Maryland, this                      day of May, 2001.

FOR THE NUCLEAR REGULATORY COMMISSION.

John W.N. Hickey, Chief  
Materials Safety and Inspection Branch,  
Division of Industrial and Medical Nuclear Safety,  
Office of Nuclear Material Safety and Safeguards.